

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES  
LITIGATION

Civil Action No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

**DECLARATION OF AMY PHARR HEFLEY**

I, Amy Pharr Hefley, declare the following pursuant to 28 U.S.C. § 1746:

1. I am an attorney with the law firm of Baker Botts L.L.P., which is counsel of record for Defendants Apache Corporation (“Apache”), John J. Christmann IV, Timothy J. Sullivan, and Stephen J. Riney in the above-styled cause of action. I am a member in good standing of the State Bar of Texas.

2. I am legally competent to make this declaration. I have personal knowledge and am familiar with the matters stated in this declaration, and all of the facts and statements contained herein are true and correct.

3. Attached as **Exhibit A** is a true and correct copy of the Report of Lucy P. Allen dated June 16, 2023.

4. Attached as **Exhibit B** is a true and correct copy of a report by Stephens, titled “Apache Corporation: APA First Look: 2Q19 EBITDAX Beat & Capex Below Expectations,” dated August 1, 2019.

5. Attached as **Exhibit C** is a true and correct copy of a report by MUFG Securities Americas Inc., titled “Apache Corp: Waiting on GCX Pipeline and the Narrowing of Diffs,” dated August 2, 2019.

6. Attached as **Exhibit D** is a true and correct copy of an APA Corporation press release, titled “Apache Corporation Announces Temporary Deferral of Alpine High Natural Gas Production in Response to Recent Pricing at Waha Hub,” dated April 23, 2019.

7. Attached as **Exhibit E** is a true and correct copy of a report by Stephens, titled “Apache Corporation: First Look: APA Announces Temporary Deferral of Alpine High Gas Volumes,” dated April 23, 2019.

8. Attached as **Exhibit F** is a true and correct copy of a report by Scotiabank, formerly known as Scotia Howard Weil, titled “Today’s Research: Energy Commentary,” dated April 23, 2019.

9. Attached as **Exhibit G** is a true and correct copy of a report by Macquarie Research, titled “Apache Corp (APA US): Effects of Negative Waha Prices,” dated April 23, 2019.

10. Attached as **Exhibit H** is a true and correct copy of an article by Michael Bellusci, titled “Apache Investors May See Keenan Exit Due to Suriname, RBC Says,” published by *Bloomberg*, and dated October 25, 2019.

11. Attached as **Exhibit I** is a true and correct copy of a report by Credit Suisse, titled “Apache Corporation: Resignation of Exploration Head Highlights Suriname Risk to Share Price,” dated October 25, 2019.

12. Attached as **Exhibit J** is a true and correct copy of a report by RBC Capital Markets, titled “APA – SVP Resignation Causing Stock Weakness; Company Indicating Not Related to Maka-1 Outcome,” dated October 25, 2019.

13. Attached as **Exhibit K** is a true and correct copy of a report by Truist Bank, formerly known as SunTrust Robinson Humphrey, titled “Apache Corporation (APA): Resignation not Linked to Upcoming Suriname Well Result,” dated October 25, 2019.

14. Attached as **Exhibit L** is a true and correct copy of an article by Sarfaraz A. Khan posted on *Seeking Alpha* titled, “The Oil Price Crash Puts Apache Corporation in A Tough Spot,” dated on March 16, 2020.

15. Attached as **Exhibit M** is a true and correct copy of excerpts from the transcript of the May 25, 2023 deposition of David Sullivan, the corporate representative for Lead Plaintiff Plymouth County Retirement Association.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2023.

  
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Amy Pham Hefley